



February 19, 2010

Via FCC ECFS, Email & UPS Overnight Mail

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission ("FCC")
445 12th Street, S.W.
Suite TW-A325
Washington, DC 20554

In re: EB Docket No. 06-36
Annual 64.2009 CPNI Certification for 2009
One Communications Corp.(and all subsidiaries in Annex A – Form 499 ID 822054

Dear Secretary Dortch:

Enclosed in connection with the above referenced docket, please find the original executed Annual 47 C.F.R. § 64.2009(e) CPNI Certification for One Communications Corp. ("ONE") and its' subsidiaries listed in Annex A. The Certification is signed by Raymond B. Ostroski, ONE's Executive Vice-President, General Counsel & Secretary. This filing covers calendar year 2009. A copy of this Certification was also filed electronically.

If you have any questions, please contact me directly at 781-362-5707 or via email at RWheeler@OneCommunications.com. Thank you for your cooperation in this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Richard Wheeler".

Richard Wheeler, Esq.
One Communications

cc: Colleen Heitkamp (via Email)
Marcy Green (via Email)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year 2009

Date filed: February 19, 2010

Name of company covered by this certification: ONE Communications Corp. and its subsidiaries listed in Annex A hereto (collectively "ONE")

Form 499 Filer ID: 822054 (consolidated 499 for ONE)

Name of signatory: Raymond B. Ostroski

Title of signatory: Executive Vice President and General Counsel

I, Raymond B. Ostroski, certify that I am an officer of ONE, and acting as an agent of ONE, that I have personal knowledge that ONE has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

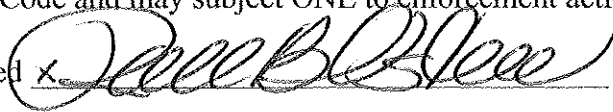
Attached to this certification is an accompanying statement explaining how ONE's procedures ensure ONE is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

ONE has not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. ONE has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.*, through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps ONE has taken to protect CPNI include updating its CPNI practices and procedures and conducting training designed to ensure compliance with the FCC's CPNI rules.

ONE has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. I also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject ONE to enforcement action.

Signed ☒



Raymond B. Ostroski
Executive Vice President and General Counsel
ONE Communications Corp. and each of the subsidiaries
listed in Annex A

ONE COMMUNICATIONS CORP. AND SUBSIDIARIES STATEMENT OF CPNI COMPLIANCE PROCEDURES

One Communications Corp. and its subsidiaries listed in Annex A hereto (collectively, “ONE”) provide voice, data and Internet services to business customers throughout the Northeast, Mid-Atlantic and Midwest areas of the United States. ONE has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission’s (“FCC”) rules pertaining to customer proprietary network information (“CPNI”) set forth in sections 64.2001 – 64.2011 of the Commission’s rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission’s CPNI rules, as modified by the Commission in 2007.

ONE takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers in accordance with FCC rules prior to disclosing CPNI based on customer-initiated contacts. ONE is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

ONE has a policy of providing regular written CPNI notices to all customers and seeks to obtain written approval from each customer to use CPNI for marketing purposes. ONE also provides existing customers with the ability to change or rescind their consent to its use of their CPNI at any time. ONE’s CPNI notices explain the customers’ CPNI rights in accordance with the FCC’s CPNI rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices also provide information on how customers can choose to not receive marketing from ONE that is based upon ONE’s use of their CPNI. From time to time, ONE may use CPNI to market communications-related services outside of those services to which a customer already subscribes but only where the customer has granted approval pursuant to instructions in the CPNI notices. ONE maintains records of customer approval and the delivery of its CPNI notices for at least one (1) year.

ONE has implemented a system by which the status of a customer’s CPNI approval can be clearly established prior to the use or disclosure of that customer’s CPNI. Specifically, ONE maintains a database for tracking CPNI restricted accounts (those accounts for which written approval has not been obtained from the customer) (the “Data Base”). In addition, ONE’s applicable systems have been designed so as to clearly show whether a customer has approved the use of CPNI for marketing purposes. ONE representatives who market to existing customers are required to check the Data Base and ONE’s internal systems to determine whether they must refrain from marketing to specific customers. If a customer is listed in the Data Base, ONE representatives are not permitted to use CPNI to market services to that customer.

As permitted by the CPNI rules, ONE may use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of ONE, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features. While ONE occasionally shares CPNI with third parties for use in provisioning the services to which its customers subscribe, these third parties are not permitted to use such information for marketing purposes.

ONE maintains a record for at least one (1) year of its own and affiliates' sales and marketing campaigns that use customers' CPNI. ONE has established a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules. This process includes a periodic review by ONE's senior marketing personnel who are responsible for approving any proposed outbound marketing requests that would require customer approval. Additionally, ONE marketing supervisors monitor customer calls from time-to-time to assure that customer accounts and information are being accessed properly and consistent with ONE's CPNI policies.

All ONE employees who have access to CPNI receive training about CPNI compliance. Specifically, all new employees are provided with CPNI training at new-hire orientation that is based upon the policies and procedures set forth in ONE's CPNI Policy. Moreover, a summary of ONE's CPNI policies are included in its Employee Handbook. All employees are required to acknowledge in writing that they have read and understand the information in the Employee Handbook. All employees are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by ONE. Employees who do not abide by these policies or otherwise permit the unauthorized access to, use or disclosure of CPNI are subject to discipline, which may include termination.

ONE has in place procedures to ensure that it will provide written notice to the FCC within five business days of it becoming aware of any instance where its opt-out mechanisms do not work properly to such a degree that its customers' inability to opt-out is more than an anomaly. These procedures ensure that the notice will be in the form of a letter, and will include: (i) ONE's name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether ONE has taken any action; (vii) a copy of the notice provided to customer(s); and (viii) contact information. ONE will submit the above letter even if it offers other methods by which its customers may opt-out.

ONE has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, ONE will notify affected customers in a manner that conforms with the relevant FCC rules. ONE will maintain a record of any CPNI-related breaches for a period of at least two (2) years.

ONE has implemented procedures whereby it will not provide CPNI without proper customer authentication for both inbound telephone calls and online account access. In order to authenticate a customer's identity prior to disclosing CPNI, ONE authenticates the customer using a variety of methods. ONE does not provide call detail records on inbound telephone calls. Call detail records are provided to a customer's address of record (either physical address or e-mail) or to the customer's telephone number of record. ONE has implemented a backup method for allowing customers to change passwords in the event that passwords are lost or forgotten that conforms to the relevant FCC rules. ONE has implemented procedures to inform customers of change of address, e-mail and other changes to account information in a manner that conforms to the relevant FCC rules.

Annex A

COMPANY NAME
Choice One Communications of Connecticut Inc.
Choice One Communications of Maine Inc.
Choice One Communications of Massachusetts Inc.
Choice One Communications of New York Inc.
Choice One Communications of Ohio Inc.
Choice One Communications of Pennsylvania Inc.
Choice One Communications of Rhode Island Inc.
Choice One Communications of Vermont Inc.
Choice One of New Hampshire Inc.
Choice One Communications Resale L.L.C.
Connecticut Telephone & Communication Systems, Inc.
Connecticut Broadband, LLC
CTC Communications Corp.
CTC Communications of Virginia, Inc.
Conversent Communications of Massachusetts, Inc.
Conversent Communications of Connecticut, LLC
Conversent Communications of Maine, LLC
Conversent Communications of New Hampshire, LLC
Conversent Communications of New Jersey, LLC
Conversent Communications of New York, LLC
Conversent Communications of Pennsylvania, LLC
Conversent Communications of Rhode Island, LLC

Conversent Communications of Vermont, LLC
Conversent Communications Resale L.L.C.
Lightship Telecom, LLC
US Xchange of Illinois, L.L.C.
US Xchange of Indiana, L.L.C.
US Xchange of Michigan, L.L.C.
US Xchange of Wisconsin, L.L.C.